

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MARY PHILLIPA SLEDGE, MARY
JANE PIDGEON SLEDGE TRUST, and
PIDGEON SLEDGE FAMILY LIMITED
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and
CLEAL WATTS, III,

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE ADDITIONAL PAGES

COME NOW Mary Phillipa Sledge, Mary Jane Pidgeon Sledge Trust, and Pidgeon Sledge Family Limited Partnership ("Plaintiffs"), pursuant to the Federal Rules of Civil Procedure and this Court's Local Rule 56.1, and move this Court for leave to file additional pages related to their pending Motion for Summary Judgment. As grounds for this motion, Plaintiffs would show that this action derives from a complicated fraudulent investment scheme occurring over many years and damaging Plaintiffs in excess of \$5 million. The Complaint in this matter itself involves thirteen (13) causes of action. In order to adequately demonstrate to the Court that Plaintiffs are entitled to judgment as a matter of law as to each cause of action, Plaintiffs require more than the twenty (20) pages permitted for a memorandum and the ten (10) pages permitted for their statement of undisputed material facts. The scheme perpetrated by Defendants was complex and discovery has revealed numerous facts which are both undisputed

and critical to Plaintiffs' pending Rule 56 motion. Accordingly, so as to show the court the legal and factual bases for their pending summary judgment motion, Plaintiffs move the Court for leave to file a memorandum of 22 pages and a statement of undisputed material facts of 15 pages.

Respectfully Submitted,

/s/ Darrell N. Phillips
PIETRANGELO COOK PLC
Anthony C. Pietrangelo BPR # 15596
John J. Cook BPR # 17725
Darrell N. Phillips BPR #30299
6410 Poplar Avenue, Suite 190
Memphis, TN38119
901.685.2662
901.685.6122 (fax)
dphillips@pcplc.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 7th day of January 2015, a copy of the foregoing electronically submitted document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Randall Fishman
Richard Townley
Ballin, Ballin & Fishman
200 Jefferson Ave., Suite 1250
Memphis, TN 38103

/s/ Darrell N. Phillips

CERTIFICATE OF CONSULTATION

The undersigned hereby certifies that he consulted with Richard Townley, counsel for Defendants on January 7, 2015 and that Mr. Townley has indicated that he will not oppose this motion but cannot consent.

/s/ Darrell N. Phillips